

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CARTIER INTERNATIONAL AG and CARTIER, a  
division of RICHEMONT NORTH AMERICA,

Plaintiffs,

- against -

ILS HOLDINGS, LLC and SWISS WATCH  
INTERNATIONAL, INC d/b/a THE SWI GROUP.

Defendants.

10-CIV-6390 (LBS)

**MOTION TO ADMIT**  
**COUNSEL PRO HAC VICE**

PURSUANT TO RULE 1.3(C) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, L. Donald Prutzman, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of:

Applicant Name:	Gabriel Groisman, Esq.
Firm Name:	Coffey Burlington
Address:	Office In The Grove, PH 2699 South Bayshore Dr Miami, Florida 33133
Phone:	305-858-2900
Fax:	305-858-5261

Gabriel Groisman is a member in good standing of the Bar of the State of Florida. A Certificate of Good Standing dated within thirty (30) days of the date of this motion is annexed as Exhibit A. There are no pending disciplinary proceedings against Mr. Groisman in any state or federal court.

Dated: New York, New York  
November 16, 2010

NOV 18 2010

925-921601

RECEIVED  
NOV 18 2010  
CLERK OF COURT  
U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

Respectfully submitted,

TANNENBAUM HELPERN SYRACUSE  
& HIRSCHTRITT LLP

By: 

L. Donald Prutzman

900 Third Avenue  
New York, NY 10022  
(212) 508-6723

# Exhibit A



## The Florida Bar

JOHN F. HARKNESS, JR.  
EXECUTIVE DIRECTOR

651 EAST JEFFERSON STREET  
TALLAHASSEE, FLORIDA 32399-2300

850/561-5600  
WWW.FLORIDABAR.ORG

State of Florida )

County of Leon )

In Re: 25644  
Gabriel Groisman  
Coffey Burlington  
2699 S. Bayshore Dr. Ph  
Miami, FL

I HEREBY CERTIFY that I am the duly appointed custodian of membership records of The Florida Bar.

I FURTHER CERTIFY that the records in the office of the Clerk of the Supreme Court of Florida indicate that said attorney was admitted to practice law in the State of Florida on September 22, 2006.

I FURTHER CERTIFY that the records in the office of The Florida Bar indicate that the above attorney is an active member of The Florida Bar in good standing.

Dated this 3rd day of November, 2010.

Willie Mae Shepherd  
Supervisor, Membership Records  
The Florida Bar

WMS/ssT4:R10

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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CARTIER INTERNATIONAL AG and CARTIER, a	:
division of RICHEMONT NORTH AMERICA,	:
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Plaintiffs,	:
	:
- against -	:
	:
ILS HOLDINGS, LLC and SWISS WATCH	:
INTERNATIONAL, INC d/b/a THE SWI GROUP.	:
	:
Defendants.	:
-----X	

10-CIV-6390 (LBS)

**AFFIDAVIT OF**  
**L. DONALD PRUTZMAN**  
**IN SUPPORT OF MOTION**  
**TO ADMIT COUNSEL**  
**PRO HAC VICE**

STATE OF NEW YORK     )  
                                  ) ss.:  
COUNTY OF NEW YORK   )

L. DONALD PRUTZMAN, being duly sworn, deposes and says:

1. I am a member of the bar of this Court and of Tannenbaum Helpert Syracuse & Hirschtritt LLP, local counsel for defendants in this action. I am familiar with the proceedings in this case. I make this affidavit based on my personal knowledge of the facts set forth herein and in support of my motion to admit Gabriel Groisman as counsel *pro hac vice* to represent defendants in this action.

2. I am a member in good standing of the bar of the State of New York and was admitted to practice law in July 1977. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. Mr. Groisman is a member of Coffee Burlington of Miami, Florida.

4. Based on my knowledge of Mr. Groisman and my discussions with one of my partners who has known him for many years, I believe him to be a skilled attorney and a person

of integrity who is experienced in Federal practice and familiar with the Federal Rules of Civil Procedure.

5. Accordingly, I am pleased to move the admission of Gabriel Groisman, *pro hac vice*.

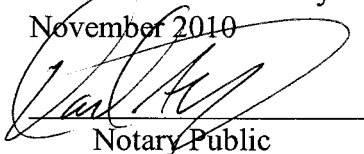
6. I respectfully submit a proposed order granting the admission of Gabriel Groisman, *pro hac vice*, which is annexed hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Gabriel Groisman, *pro hac vice*, to represent defendants in this action be granted.



L. Donald Prutzman

Subscribed to and Sworn  
before me this 16th day of  
November 2010

  
Notary Public

DAVID A. PELLEGRINO  
Notary Public, State of New York  
No. 02PE6144852  
Qualified in New York County  
Commission Expires May 1, 2011

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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division of RICHEMONT NORTH AMERICA, :  
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Plaintiffs, :  
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- against - :  
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:  
ILS HOLDINGS, LLC and SWISS WATCH :  
INTERNATIONAL, INC d/b/a THE SWI GROUP. :  
:  
:  
Defendants. :  
----- X

**ORDER ADMITTING**  
**GABRIEL GROISMAN**  
**PRO HAC VICE**

Upon the motion of L. Donald Prutzman, attorney for Defendants and said sponsor's  
affidavit in support:

**IT IS HEREBY ORDERED** that

Applicant Name: Gabriel Groisman, Esq.  
Firm Name: Coffey Burlington  
Address: Office In The Grove, PH  
2699 South Bayshore Dr  
Miami, Florida 33133  
Phone: 305-858-2900  
Fax: 305-858-5261  
Email: [GGroisman@coffeyburlington.com](mailto:GGroisman@coffeyburlington.com)

is admitted to practice *pro hac vice* as counsel for defendants in the above captioned case in the  
United States District Court for the Southern District of New York. All attorneys appearing  
before this Court are subject to the Local Rules of this Court, including the Rules governing  
discipline of attorneys. Counsel shall immediately apply for an ECF password at  
[nysd.uscourts.gov](http://nysd.uscourts.gov). Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

Dated: , 2010

\_\_\_\_\_  
U.S.D.J.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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CARTIER INTERNATIONAL AG and CARTIER,  
a division of RICHEMONT NORTH AMERICA,

Plaintiffs,

10-CIV-6390 (LBS)

-against-

ILS HOLDINGS, LLC and SWISS WATCH  
INTERNATIONAL, INC. d/b/a THE SWI GROUP,

Defendants.  
-----X

**AFFIDAVIT OF SERVICE BY REGULAR U.S. MAIL**

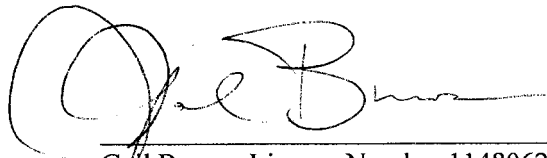
STATE OF NEW YORK     )  
                                  ) ss.:  
COUNTY OF NEW YORK    )

Gail Burwa, being duly sworn, deposes and says:

I am not a party to this action, am over eighteen years of age, and reside in Whiting, New Jersey.

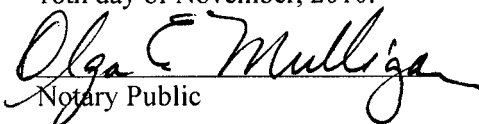
On November 18, 2010, I served via regular U.S. mail true & correct copies of the **MOTION TO ADMIT COUNSEL PRO HAC VICE FOR GABRIEL GROISMAN, ESQ. dated 11/16/10 and the MOTION TO ADMIT COUNSEL PRO HAC VICE FOR KEVIN CROW KAPLAN, ESQ. dated 11/16/10** by depositing the true & correct copies thereof in a postpaid wrapper, in an official depository under the exclusive care and custody of the United States Postal Service within New York State, addressed to John Paul Margiotta, Fross Zelnick Lehrman & Zissu, P.C., 866 United Nations Plaza, New York, New York 10004.

Dated: New York, New York  
November 18, 2010



Gail Burwa, License Number 1148062  
Tannenbaum Helpm Syracuse Hirschtritt LLP  
900 Third Avenue  
New York, New York 10022  
(212) 508-6700

Sworn to before me this  
18th day of November, 2010.

  
Notary Public

**Olga E. Mulligan**  
**Notary Public, State of New York**  
**No: 01MU4989802**  
**Qualified in Nassau County**  
**Commission Expires February 08, 2014**